

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
MEMPHIS DIVISION**

IN RE:	: CASE NO: 10-21899-PJD
	: CHAPTER: 11
	:
AUBREY BRUCE WRING,	:
VIRGINIA A. WRING,	:
	:
Debtors.	:

MICHAEL P. COURY, Trustee,	:
	:
Movant,	: CONTESTED MATTER
	:
vs.	:
	:
BANK OF AMERICA, N.A.,	:
	:
Respondent.	:

**RESPONSE TO CHAPTER 11 TRUSTEE'S MOTION FOR AN ADMINISTRATIVE ORDER
APPROVING SALE AND BID PROCEDURE PURSUANT TO SECTIONS 105(S), 363 OF THE
BANKRUPTCY CODE**

COMES NOW Bank of America, N.A., for itself, its successors and/or assigns ("Respondent"), and shows this Honorable Court that, for the reasons set out below, the Court should deny the Trustee's Chapter 11 Trustee's Motion for an Administrative Order Approving Sale and Bid Procedure Pursuant to Sections 105(s), 363 of the Bankruptcy Code ("Motion"):

1.

Respondent asserts that it holds secured liens for seventy-four (74) properties held in Debtor's bankruptcy estate. A list of these properties is attached hereto as Exhibit "A."

2.

Respondent does not object to the sale of said properties, provided that it is paid in full from the proceeds of the sales. Respondent reserves the right to review any and all sale closing documents with respect to the payoffs of its liens on the properties and satisfactions thereof. Any approvals by Respondent of the sale terms shall be obtained in writing prior to Respondent accepting funds from the

Debtors in satisfaction of Respondent's liens. Payoff quotes may be obtained by contacting the undersigned.

WHEREFORE, Respondent, for itself, its successors and/or assigns, prays that this Court inquire as to the matters raised herein and deny the Trustee's Motion and enter such orders and require such further inquiry as may appear appropriate to the Court.

/s/ Natalie Brown
Natalie Brown
TN BPR No. 022452
Rubin Lublin TN, PLLC
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Attorney for Respondent

CERTIFICATE OF SERVICE

I, Natalie Brown of Rubin Lublin TN, PLLC certify that on the 3rd day of February, 2014, I caused a copy of the Response to Chapter 11 Trustee's Motion for an Administrative Order Approving Sale and Bid Procedure Pursuant to Sections 105(s), 363 of the Bankruptcy Code to be to be filed in this proceeding by electronic means and to be served by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to the said parties as follows:

AUBREY BRUCE WRING
5524 RIVERDALE ROAD
MEMPHIS, TN 38141

VIRGINIA A. WRING
5524 RIVERDALE ROAD
MEMPHIS, TN 38141

WALTER L. BAILEY, JR.
100 N. MAIN SUITE 3002
MEMPHIS, TN 38103

MICHAEL P. COURY
GLANKLER BROWN PLLC
SUITE 400
6000 POPLAR AVENUE
MEMPHIS, TN 38119

UNITED STATES TRUSTEE
OFFICE OF THE U.S. TRUSTEE
ONE MEMPHIS PLACE
200 JEFFERSON AVENUE, SUITE 400
MEMPHIS, TN 38103

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on 2/3/14

By: /s/ Natalie Brown
Natalie Brown
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